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FILED ELECTRONICALLY

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

**Re: Sirius XM Radio Inc. Notice of Appearance in AST&Science Application
Call Sign S3065, File Nos. SAT-PDR-20200413-00034 & SAT-APL-20200727-00088**

Dear Ms. Dortch:

Sirius XM Radio Inc. ("Sirius XM"), by its attorney, hereby advises the Commission that it intends to participate in any Commission proceeding regarding the above-referenced AST&Science ("AST") application as amended seeking U.S. market access for the proposed SpaceMobile satellite network (the "AST Application").

Sirius XM has a strong interest in the AST Application. Sirius XM and its affiliates use frequencies purchased via auction at 2320-2345 MHz to provide Satellite Digital Audio Radio Service ("SDARS") to tens of millions of U.S. subscribers. In addition, Sirius XM has worked closely with Wireless Communications Service ("WCS") licensees that hold authorizations for the adjacent spectrum on either side of the SDARS band to coordinate operations in order to minimize the likelihood of harmful out-of-band emissions that could degrade the quality and reliability of Sirius XM's service to its customers.

The documents submitted by AST include inconsistent information regarding which precise frequencies the company is seeking to use, but AST's most recent Schedule S specifies broad spectrum ranges that encompass the entire SDARS and WCS bands.¹ AST has not attempted to justify its request to use SDARS spectrum exclusively licensed to Sirius XM or provided an analysis of whether its proposed operations in the WCS frequencies would adequately limit interference into the SDARS band. Given Sirius XM's complete dependence on the SDARS band to serve its customers, Sirius XM cannot envision an interference analysis that would support AST's use of this band.

In light of these concerns, Sirius XM asks the Commission to treat this letter as a "written submission referencing and regarding" the AST Application under Section 1.1202(d)(1) of the Commission's rules, making Sirius XM a party to any proceedings on the application for

¹ See *AST&Science*, Call Sign S3065, File No. SAT-APL-20200727-00088, Schedule S at 3 (identifying operating frequency bands that include 1805-2360 MHz for transmit use and 1710-2320 MHz for receive use).

purposes of the Commission's *ex parte* rules, 47 C.F.R. §§ 1.1200 *et seq.* As a party, Sirius XM is entitled under Section 1.1208 to prior notice and an opportunity to participate in any *ex parte* discussions regarding the AST Application.

Please address any questions regarding this matter to the undersigned.

Respectfully submitted,

/s/ Karis A. Hastings

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